

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

**FEE STATEMENT COVER SHEET**

Debtor: LTL Management LLC Applicant: Paul Hastings LLP  
Case No.: 23-12825 (MBK) Client: Ad Hoc Committee of Supporting Counsel  
Chapter: 11 Case Filed: April 4, 2023

**SECTION I  
FEE SUMMARY**

Monthly Fee Statement Covering the Period from  
April 1, 2024 through April 30, 2024

Total Fees:	\$17,604.50
Total Disbursements:	\$2,027.96
Less 20% holdback of Fees:	\$3,520.90
<b>Amount Sought at this Time:</b>	<b>\$16,111.56</b>

Name	Department or Group	Date of First Admission	Hourly Rate	Total for Statement Period	
				Hours Billed	Amount
Matthew Micheli	Financial Restructuring	2002	\$1885.00	2.90	\$5,466.50
<b>Total Counsel:</b>				<b>2.90</b>	<b>\$5,466.50</b>
Angelika S. Glogowski	Financial Restructuring	2021	\$1185.00	0.30	\$355.50
Lanie Miliotes	Financial Restructuring	2023	\$985.00	0.40	\$394.00
Louise Simpson	Financial Restructuring	2022	\$985.00	10.30	\$10,145.50
<b>Total Associate:</b>				<b>11.00</b>	<b>\$10,895.00</b>
Michael Magzamen	Financial Restructuring		\$565.00	2.20	\$1,243.00
<b>Total Paraprofessional:</b>				<b>2.20</b>	<b>\$1,243.00</b>
<b>Total:</b>				<b>16.10</b>	<b>\$17,604.50</b>

**SECTION II  
SUMMARY OF SERVICES**

	<b>Total for Statement Period</b>	
<b>U.S. Trustee Task Code and Project Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
B113 Pleadings Review	0.30	\$169.50
B160 Employment / Fee Applications (Paul Hastings)	15.80	\$17,435.00
<b>TOTAL:</b>	<b>16.10</b>	<b>\$17,604.50</b>

**SECTION III**  
**SUMMARY OF DISBURSEMENTS**

Category	Total for Statement Period
Computer Search	\$9.46
Outside Professional Services	\$1,166.82
Taxi/Ground Transportation	\$515.00
Meals	\$336.68
<b>TOTAL:</b>	<b>\$2,027.96</b>

I certify under the penalty of perjury that the above is true.

Dated: August 13, 2024

/s/ Mathew M. Murphy

Mathew M. Murphy

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

PAUL HASTINGS LLP  
200 Park Avenue  
New York, New York 10166  
Kristopher M. Hansen (admitted *pro hac vice*)

PAUL HASTINGS LLP  
71 South Wacker Drive, Suite 4500  
Chicago, Illinois 60606  
Matthew M. Murphy (admitted *pro hac vice*)

COLE SCHOTZ P.C.  
Court Plaza North  
25 Main Street, P.O. Box 800  
Hackensack, New Jersey 07602-0800  
Michael D. Sirota  
Warren A. Usatine  
Seth Van Aalten (admitted *pro hac vice*)  
Justin Alberto (admitted *pro hac vice*)

PARKINS & RUBIO LLP  
700 Milam, Suite 1300  
Houston, Texas 77002  
Lenard M. Parkins (admitted *pro hac vice*)  
Charles M. Rubio (admitted *pro hac vice*)

*Counsel to Ad Hoc Committee of Supporting  
Counsel*

In re:

LTL MANAGEMENT LLC,<sup>1</sup>

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

**MONTHLY FEE STATEMENT OF PAUL HASTINGS LLP,  
COUNSEL TO AD HOC COMMITTEE OF SUPPORTING COUNSEL, FOR THE  
PERIOD FROM APRIL 1, 2024 THROUGH APRIL 30, 2024**

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<sup>1</sup> The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

On June 20, 2023, the Court entered the Order Authorizing the Debtor to Enter into the Reimbursement Agreement [ECF No. 838] (the “Reimbursement Order”), pursuant to which the Debtor entered into a post-petition expense reimbursement agreement (the “Reimbursement Agreement”) to pay certain fees and expenses of the Ad Hoc Committee of Supporting Counsel (the “AHC of Supporting Counsel”).

The Reimbursement Agreement provides that the Debtor will pay the reasonable and documented fees and out-of-pocket expenses of professionals retained by the AHC of Supporting Counsel, including, among others, Paul Hastings LLP (“Paul Hastings”), for the period from April 18, 2023 through the termination of the Reimbursement Agreement.

The Reimbursement Agreement further provides that Paul Hastings will file monthly fee statements and interim and final fee applications in accordance with the Court’s Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals [ECF No. 562] (the “Interim Compensation Order”), entered on May 22, 2023.

The Court’s *Order (I) Dismissing Debtor’s Chapter 11 Petition Pursuant to 11 U.S.C. § 1112(b); (II) Establishing Procedures With Respect to Requests for Compensation; and (III) Granting Related Relief* [ECF No. 1211] (the “Dismissal Order”) provides that the “fees and expenses of professionals retained by the Ad Hoc Committee of Supporting Counsel shall remain subject to the” Reimbursement Agreement. The Dismissal Order further provides that the Interim Compensation Order “shall remain in full force and effect through and including the Appeal Exhaustion Date” for Retained Professionals, which covers professionals retained by the Ad Hoc Committee of Supporting Counsel.

Paul Hastings respectfully submits this Fee Application in accordance with the Reimbursement Order, the Reimbursement Agreement, the Interim Compensation Order, and the

Dismissal Order for services rendered and expenses incurred as counsel to the Ad Hoc Committee of Supporting Counsel for the period commencing April 1, 2024 and ending April 30, 2024 (the “Statement Period”).

The billing invoice, including a detailed breakdown of all out-of-pocket disbursements necessarily incurred by Paul Hastings for the Statement Period, is annexed hereto as Exhibit A. This invoice details the services performed by Paul Hastings during the Statement Period.

The payment of fees and reimbursement of expenses requested in this Statement are as follows:

<b>Fees (100%)</b>	<b>Fee Holdback (20%)</b>	<b>Fee Payment (80%)</b>	<b>Expense Reimbursement (100%)</b>
\$17,604.50	\$3,520.90	\$14,083.60	\$2,027.96

**WHEREFORE**, Paul Hastings respectfully requests payment of fees and reimbursement of expenses for the Statement Period of \$16,111.56 (80% of total fees and 100% of expenses) in accordance with the Interim Compensation Order.

Dated: August 13, 2024

**PAUL HASTINGS LLP**

/s/ Matthew M. Murphy

Matthew M. Murphy (*admitted pro hac vice*)  
71 South Wacker Drive, Suite 4500  
Chicago, IL 60606  
Telephone: (312) 499-6000  
Email: mattmurphy@paulhastings.com

Kristopher M. Hansen (*admitted pro hac vice*)  
200 Park Avenue  
New York, NY 10166  
Telephone: (212) 318-6000  
Email: krishansen@paulhastings.com

*Counsel to AHC of Supporting Counsel*

**EXHIBIT A**





**PAUL HASTINGS LLP**  
200 Park Avenue, New York, NY 10166-3205  
t: +1.212.318.6000 | f: +1.212.319.4090 | [www.paulhastings.com](http://www.paulhastings.com)

Ad Hoc Committee of Supporting Talc Counsel in LTL August 6, 2024  
488 Madison Avenue  
New York, NY

Please Refer to  
Invoice Number: 2407245

Attn: Jonathan Schulman

PH LLP Tax ID No. 95-2209675

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## SUMMARY SHEET

### Representation in Chapter 11 bankruptcy proceedings

PH LLP Client/Matter # 51691-00002  
Scott A. Heard

Legal fees for professional services for the period ending April 30, 2024	\$17,604.50
Costs incurred and advanced	2,027.96
<b>Current Fees and Costs Due</b>	<b>\$19,632.46</b>
<b>Total Balance Due - Due Upon Receipt</b>	<b>\$19,632.46</b>

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

***TO PROTECT AGAINST FRAUD***, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Teri Goffredo @ 213-683-5045 or via email @ [terigoffredo@paulhastings.com](mailto:terigoffredo@paulhastings.com) and requesting written and verbal confirmation.

**Wiring and ACH Instructions:**  
Citibank  
ABA # 322271724  
SWIFT Address: CITIUS33  
787 W. 5th Street  
Los Angeles, CA 90071  
Account Number: 206628380  
Account Name: Paul Hastings LLP

**Remittance Address:**  
Paul Hastings LLP  
Lockbox 4803  
PO Box 894803  
Los Angeles, CA  
90189-4803

**Pay by Tranch:**  
You can now pay your invoices online via real-time bank payments, credit cards or in installments:  
<https://paywithtranch.com/paulhastings>

For wires, please reference the invoice, client and matter number(s) being paid  
For ACH payments, please use the CTX format and/or send any remittances to [cashepn@paulhastings.com](mailto:cashepn@paulhastings.com). This is a no-reply mailbox  
Please refer all questions to [billing@paulhastings.com](mailto:billing@paulhastings.com)



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Ad Hoc Committee of Supporting Talc Counsel in LTL August 6, 2024  
488 Madison Avenue  
New York, NY

Please Refer to  
Invoice Number: 2407245

Attn: Jonathan Schulman

PH LLP Tax ID No. 95-2209675

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**REMITTANCE COPY**

**Representation in Chapter 11 bankruptcy proceedings**

PH LLP Client/Matter # 51691-00002  
Scott A. Heard

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Account Name: Paul Hastings LLP

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real-time bank payments, credit cards or  
in installments:  
<https://paywithtranch.com/paulhastings>

*For wires, please reference the invoice, client and matter number(s) being paid  
For ACH payments, please use the CTX format and/or send any remittances to [cashepn@paulhastings.com](mailto:cashepn@paulhastings.com). This is a no-reply mailbox  
Please refer all questions to [billing@paulhastings.com](mailto:billing@paulhastings.com)*



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Ad Hoc Committee of Supporting Talc Counsel in LTL August 6, 2024  
488 Madison Avenue  
New York, NY

Please Refer to  
Invoice Number: 2407245

Attn: Jonathan Schulman

PH LLP Tax ID No. 95-2209675

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FOR PROFESSIONAL SERVICES RENDERED  
for the period ending April 30, 2024

**Representation in Chapter 11 bankruptcy proceedings** **\$17,604.50**

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>B113 Pleadings Review</b>					
04/02/2024	MM57	Research re: ECF filings and update working group re: same	0.10	565.00	56.50
04/30/2024	MM57	Research re: ECF filings and update working group re: same	0.20	565.00	113.00
<b>Subtotal: B113 Pleadings Review</b>			<b>0.30</b>		<b>169.50</b>
<b>B160 Fee/Employment Applications</b>					
04/03/2024	LM20	Correspond with L. Simpson re billing procedures	0.40	985.00	394.00
04/05/2024	LS27	Review and revise December 2023 and February 2024 invoices (.4); correspond with M. Magzamen, M. Micheli and C. Edge re same (.3)	0.70	985.00	689.50
04/05/2024	MM53	Draft revisions to December monthly fee statement (.6); draft revisions to January monthly fee statement (.5); draft revisions to February monthly fee statement (.4)	1.50	1,885.00	2,827.50

Ad Hoc Committee of Supporting Talc Counsel in LTL  
51691-00002  
Invoice No. 2407245

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/05/2024	MM57	Correspond with L. Simpson re: February fee statement (.1); draft parts of same (.5)	0.60	565.00	339.00
04/09/2024	LS27	Review and revise December 2023 invoice and fee statement (.4); correspond with M. Micheli re same (.3); correspond and call with Cole Schotz re same (.4)	1.10	985.00	1,083.50
04/10/2024	LS27	Review December 2023 and January 2024 fee statements (.4); correspond with M. Micheli re same (.1)	0.50	985.00	492.50
04/11/2024	AG29	Correspond with L. Simpson regarding professional compensation issues (.1); review documents and issues related to same (.2)	0.30	1,185.00	355.50
04/11/2024	LS27	Correspond with M. Micheli, M. Murphy, and J. Mulligan re invoices and fee statements, related issues (.5); review and analyze issues, documentation regarding same (.6)	1.10	985.00	1,083.50
04/11/2024	MM53	Review and revise December and January monthly fee statements	0.50	1,885.00	942.50
04/11/2024	MM53	Review monthly invoice issues	0.10	1,885.00	188.50
04/12/2024	LS27	Review and revise November, December and January invoices and fee statements (.7); correspond with M. Magzamen, M. Micheli, C. Edge and Cole Schotz re same (.2)	0.90	985.00	886.50
04/12/2024	MM53	Review and revise monthly fee statements in preparation for filing	0.80	1,885.00	1,508.00
04/12/2024	MM57	Revise fee statements (.6); correspond with L. Simpson and M. Micheli re: same (.2)	0.80	565.00	452.00
04/16/2024	LS27	Review and revise February and March matter 2 invoices (1.3); correspond with J. Mulligan, M. Micheli and Jones Day re invoices (.7)	2.00	985.00	1,970.00
04/18/2024	LS27	Correspond with M. Micheli, T. Reynold, and Jones Day re invoices	0.30	985.00	295.50
04/18/2024	MM57	Draft parts of March fee statement	0.50	565.00	282.50
04/22/2024	LS27	Correspond with C. Edge regarding next steps for filing February and March invoices	0.20	985.00	197.00

Ad Hoc Committee of Supporting Talc Counsel in LTL  
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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/24/2024	LS27	Correspond with J. Mulligan and M. Micheli re invoices	0.50	985.00	492.50
04/25/2024	LS27	Review and revise documentation regarding invoices, billing (2.2); correspond with M. Micheli re same (.2)	2.40	985.00	2,364.00
04/26/2024	LS27	Review, revise documentation regarding invoices, billing (.3); correspond with Cole Schotz re CNOs (.1)	0.40	985.00	394.00
04/29/2024	LS27	Correspond with M. Micheli and Cole Schotz re filing CNOs	0.20	985.00	197.00
<b>Subtotal: B160 Fee/Employment Applications</b>			<b>15.80</b>		<b>17,435.00</b>
<b>Total</b>			<b>16.10</b>		<b>17,604.50</b>

#### Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Fee</u>
MM53	Matthew Micheli	Of Counsel	2.90	1,885.00	5,466.50
AG29	Angelika S. Glogowski	Associate	0.30	1,185.00	355.50
LM20	Lanie Miliotes	Associate	0.40	985.00	394.00
LS27	Louise Simpson	Associate	10.30	985.00	10,145.50
MM57	Michael Magzamen	Paralegal	2.20	565.00	1,243.00

#### Costs incurred and advanced

<u>Date</u>	<u>Description</u>	<u>Quantity</u>	<u>Rate</u>	<u>Amount</u>
06/30/2023	Travel Expense - Meals - Michael Magzamen; 06/26/2023; Restaurant: Salt Creek Grille; City: 609-4194200; Dinner; Number of people: 10; Trial dinner for 10 people			336.68
06/30/2023	Taxi/Ground Transportation - Michael Magzamen; 06/26/2023; From/To: Hotel/Court; Service Type: Car Service; Time: 09:30; Pick-up and drop off for trial team to and from Westin Hotel and Trenton Bankruptcy Court.			515.00

Ad Hoc Committee of Supporting Talc Counsel in LTL  
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02/28/2024	Outside Professional Services - Counsel Press, Invoice# 0009158792 Dated 02/28/24, Services rendered regarding: Preparation of brief	1,101.82
02/29/2024	UnitedLex Invoices - Unitedlex Corp, Invoice# 095537 Dated 02/29/24, UnitedLex – DSAI February 2024 Charges – Outside Professional Services	65.00
02/29/2024	Lexis/On Line Search - Courtlink Use - Charges for February, 2024	9.46
<b>Total Costs incurred and advanced</b>		<hr/> <b>\$2,027.96</b>
<b>Current Fees and Costs</b>		<b>\$19,632.46</b>
<b>Total Balance Due - Due Upon Receipt</b>		<b>\$19,632.46</b>

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